



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DEC 03 2003

R-19J

Honorable Rod R. Blagojevich
Governor of Illinois
Springfield, Illinois 62706

Dear Governor Blagojevich:

Thank you for making recommendations on 8-hour ozone air quality designations. Pursuant to the Clean Air Act (CAA), the United States Environmental Protection Agency (EPA) is required to promulgate designations for new or revised standards, such as the 8-hour ozone standard. Earlier this year, we entered into a consent decree that requires us to promulgate 8-hour ozone standard designations by April 15, 2004.

We have reviewed a July 16, 2003, letter from Renee Cipriano, Director, Illinois Environmental Protection Agency, submitting Illinois' recommendations on air quality designations for the 8-hour ozone standard. This letter is to inform you that the EPA does not intend to make modifications to the designations and boundaries recommended in the State's submittal. We will continue to work with your office and with the Illinois Environmental Protection Agency as we move forward to make final designations.

The CAA defines a nonattainment area as any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. EPA guidance indicates that Illinois should use the larger of the Consolidated Metropolitan Statistical Area, Metropolitan Statistical Area, or 1-hour ozone nonattainment area as the presumptive boundaries for an 8-hour ozone nonattainment area. The guidance provides 11 factors that states should consider in determining whether to modify the presumptive boundaries. We have reviewed the State's submittal and believe it is consistent with our guidance, with the exception noted below for Kendall and Grundy Counties.

EPA has been tracking preliminary 2003 ozone monitoring data and their impact on areas' preliminary 2001-2003 design values. Where preliminary 2001-2003 ozone monitoring data indicate that

an area's attainment status will differ from Illinois' recommendation based on 2000-2002 monitoring data, EPA indicates the potential modification to the designation recommendation in the enclosure. Additionally, the EPA will continue to closely review monitoring data for additional differences that may have occurred throughout the remainder of the 2003 ozone season or as a result of data handling procedures to determine if it might affect the State's recommended designations. It is critical for Illinois to expedite submittal of 2003 monitoring data to EPA so that air quality designations and classifications for the 8-hour standard will accurately reflect the State's air quality.

To advance this process, please submit your final 2003 monitoring data into the Air Quality System as quickly as possible, if it has not already been done. In addition, please submit the 8-hour and 1-hour ozone design values and the average expected 1-hour exceedance rates to Stephen Rothblatt, of my staff, by official letter by December 17, 2003.

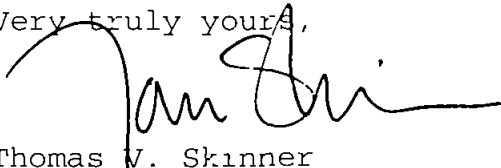
EPA believes that breathing unhealthful levels of ozone and ozone transport is a serious regional air pollution problem. Except in very limited circumstances, such as unusually large counties and counties fragmented into multiple air sheds due to geographical features, we are reluctant to designate partial counties as attainment and nonattainment. Absent a convincing rationale that the excluded portion of a county is neither experiencing ozone standard violations nor contributing to a violation in a nearby area, designating a full county as nonattainment is the appropriate designation. Such a situation applies to Kendall and Grundy Counties, where your submittal recommends that parts of these Counties be designated as nonattainment and parts as attainment.

Your submittal provides evidence that Kendall and Grundy Counties, as a whole and in conjunction with DeKalb and Kankakee Counties, are not a significant source area for ozone precursor emissions relative to your recommended Chicago 8-hour ozone nonattainment area. In addition, although Kendall and Grundy Counties are not monitored for ozone, they are adjoining counties that are monitored as attaining the 8-hour ozone standard and are not adjoining any counties that are monitoring nonattainment of the 8-hour ozone standard. This implies that Kendall and Grundy Counties may themselves be attaining the 8-hour ozone standard. We note, however, that the parts of Kendall and Grundy Counties the State recommends for inclusion in the 8-hour nonattainment area are the portions of these counties that were included in the 1-hour ozone nonattainment area. Based on the fact that these portions of the Counties were part of the nonattainment area for

the 1-hour standard, we agree with the State's recommendation to include them as part of the Chicago 8-hour ozone nonattainment area.

If you would like to provide additional information, please provide this information by February 6, 2004, so that we can continue to work with your office as we move forward to make final designations. We look forward to a continued dialog with Illinois as we work to finalize the designations for the 8-hour ozone standard. If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tom Skinner", written over the closing "yours,".

Thomas V. Skinner
Regional Administrator

Enclosure

cc. Renee Cipriano, Director
Illinois Environmental Protection Agency

Lori Kaplan, Commissioner
Indiana Department of Environmental Management

Stephen Mahfood, Director
Missouri Department of Natural Resources

Enclosure

The following table identifies areas within Illinois that the EPA intends to designate as nonattainment of the 8-hour ozone national ambient air quality standards. Where EPA intends to include only part of a county in a nonattainment area, we have indicated the boundaries of the portion of the county that will be included. EPA intends to designate as attainment/unclassifiable all other Illinois counties (or parts thereof) not identified in the table below

Area	Illinois Recommended Nonattainment Counties	EPA Recommended Nonattainment Counties
Chicago-Gary-Lake County, IL-IN (*)	Cook DuPage Kane Lake McHenry Will Grundy: Aux Sable Township Goose Lake Township Kendall. Oswego Township	Cook DuPage Kane Lake McHenry Will Grundy Aux Sable Township Goose Lake Township Kendall. Oswego Township
St. Louis, MO-IL	Jersey Madison Monroe St. Clair	Jersey Madison Monroe St. Clair

* The ozone design value site for this area is currently the Chiwaukee Prairie monitoring site in Kenosha County, Wisconsin. Future ozone design value determinations will consider sites throughout the Chicago-Gary-Lake County, Illinois-Indiana ozone nonattainment area, as well as the Kenosha County monitoring sites.